

**Exhibit A**

DECLARATION OF ACTING DEPUTY FIELD OFFICE DIRECTOR

DAVID T. WESLING

Pursuant to the authority of 28 U.S.C. § 1746, I, David T. Wesling, an Acting Deputy Field Office Director for U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, Boston Field Office, located in Burlington, Massachusetts declare as follows:

1. I am an acting Deputy Field Office Director (“(a)DFOD”) for U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), Boston Field Office.
2. Included in my official duties as (a)DFOD in Burlington, Massachusetts is the responsibility for assisting in the managing and monitoring the scheduling and execution of removal orders for aliens in ICE custody. I am familiar with ICE policies and procedures for detaining individuals in order to initiate removal proceedings or to effectuate removal orders as well as releasing individuals from ICE custody.
3. I have experience utilizing ICE record systems to obtain information regarding specific aliens. ICE maintains electronic and paper records on aliens in the course of its regularly conducted business activity. These records are made in the course of regularly conducted business activity at or near the time of relevant events by a person with knowledge of these events.
4. In the course of preparing this declaration, I have examined the official records available to me regarding the immigration history and custody status of Mr. Juan Carlos Baez, A.K.A. Wilson Martell Lebron (“Baez”). I have also discussed this case internally with officials within my office.

5. Baez is a 49-year-old citizen of the Dominican Republic who entered the United States illegally and has no lawful status in the country.
6. Over the course of numerous encounters between 2007 and 2025, ICE investigated Baez's immigration status and determined that he is removable pursuant to Immigration and Nationality Act ("INA") § 212(a)(6)(A)(i) [8 U.S.C. § 1182(a)(6)(A)(i)], as an alien present in the United States without having been admitted or paroled, or who arrived at a time or place other than as designated by the Attorney General.
7. ICE officials recorded the factual basis establishing Baez's removability in agency records on October 4, 2007.
8. Based upon the investigation, on October 4, 2007, an ICE Supervisory Special Agent signed a Form I-200, Warrant for Arrest of Alien, authorizing Baez's arrest pursuant to INA § 236 [8 U.S.C. § 1226].
9. An ICE ERO Supervisory Detention and Deportation Officer signed an additional Form I-200, Warrant for Arrest of Alien, on March 26, 2025.
10. On July 21, 2009, the Middlesex Superior Court convicted BAEZ for trafficking cocaine over 200 grams in violation of M.G.L Chapter 94 Section 32, trafficking cocaine over 28 grams in violation of M.G.L. Chapter 94 Section 32 and trafficking heroin over 14 grams in violation of M.G.L Chapter 94 Section 32 and sentenced him to 15 years to 15 years and 1 day incarceration
11. On December 4, 2009, the Essex Superior Court convicted Baez for the offenses of trafficking controlled substances over 28 grams in violation of M.G.L. Chapter 94 Section 32 and trafficking controlled substances over 14 grams in violation of M.G.L. Chapter 94 Section 32 and sentenced him to 5 years to 5 years and 1 day.

12. On April 19, 2017, the Essex Superior Court vacated and dismissed convictions against Baez for trafficking controlled substances over 28 grams in violation of M.G.L. Chapter 94 Section 32 and trafficking controlled substances over 14 grams in violation of M.G.L. Chapter 94 Section 32.
13. From October 4, 2007, until March 26, 2025, Baez was not detained at any time by ICE.
14. Brian Sullivan is an ICE employee, assigned as a Supervisory Detention and Deportation Officer at the ICE ERO Boston Field Office in Burlington, Massachusetts.
15. On March 27, 2025, Baez had court at the Boston Municipal Court Central Division in Boston, MA for charges of falsifying Motor Vehicle and Registry of Motor Vehicle documents. Brian Sullivan had been summonsed for Baez's trial for testimony related to documents, including a passport. After the trial day concluded, Baez separated from his attorney and wife and attempted to leave the courthouse through a back exit. When Baez exited the courthouse, ERO officer encountered. The officers identified themselves as ICE officers and ordered Baez to stop. Baez took a couple quick steps in the opposite direction before officers were able to seize him and make the arrest.
16. Accordingly, on March 27, 2025, pursuant to ICE's statutory authority contained at 8 U.S.C. § 1226(c), Supervisory Detention and Deportation Officer Brian Sullivan, along with other ICE officials, arrested Baez in Boston, Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on the 2<sup>nd</sup> day of April, 2025

**DAVID T**  
**WESLING**

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DAVID T WESLING  
Date: 2025.04.02  
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David T. Wesling  
Acting Deputy Field Office Director  
U.S. Department of Homeland Security  
United States Immigration and Customs Enforcement  
Burlington, Massachusetts